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Via: ECF and Email

To the

Hon. Judge Stuart Bernstein
United States Bankruptcy Judge
One Bowling Green
New York NY 10004-1408

December 2, 2020

Additional time requested to file response to Trustee Fee App
Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc.
Case No. 19-12447

Dear Judge Bernstein,

I am the counsel for the Church, Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc. (Bronx Miracle or Church). I am writing to request additional time to put in our response to the hefty fees demanded by the operating trustee. The fees application is scheduled for hearing on December 8, 2020, we will request adjournment of the fees application hearing that day as your Honor had suggested in your order.

I have coordinated with the Church administrator, the Pastor and the Deacon to undertake a detailed review of the submission by the Operating Trustee of their fees. The fees demanded is appalling for the Church members and several entries are questionable and complicated. The entries are not detailed and are too brief at several places to be fully comprehended and responded to. As a sole practitioner, with other work demands and coupled with exigent circumstances, it was not feasible for me to respond timely to the fee application. Your Honor, I am coordinating with different Church members, so that their concerns can be addressed. Several members are deeply concerned with the loss of the Church and now a penalizing fee application imposed.

In order to adequately protect and defend my client it is vitally important that this request be granted in interest of justice. Your Honor, we as a Church has lot at stake here.

Wherefore, we now request and will request at the hearing on December 8, 2020 for additional time to file our response to the fee application. Respectfully submitted,

/s/karamvirdahiya
Karamvir Dahiya
for the Church and Congregants